

JAJ:MSA  
F.#2010R00770

**M-10-401**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
- - - - - X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18, U.S.C., § 1028(a)(6))

MOHAMMAD RASHID,

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

SHAWN RUSSELL, being duly sworn, deposes and says that he is a detective with the Port Authority of New York and New Jersey Police Department, assigned to the Joint Terrorism Task Force, duly appointed according to law and acting as such.

Upon information and belief, there is probable cause to believe that on or about March 29, 2010, the defendant MOHAMMAD RASHID, together with others, did knowingly and intentionally possess identification documents that are or appear to be identification documents of the United States which were produced without lawful authority, knowing that such documents were produced without such authority, in violation of Title 18, United States Code, Section 1028(a)(6).

(Title 18, United States Code, Section 1028(a)(6))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I am a detective with the Port Authority of New York and New Jersey Police Department, currently cross-designated with the Joint Terrorism Task Force ("JTTF") and assigned to the John F. Kennedy International Airport ("JFK") squad in Queens, New York. In that capacity, I investigate, among other things, immigration and document fraud with potential connections to terrorism. I have training and experience in examining identification documents for authenticity.

2. On or about March 29, 2010, at approximately 9:30 p.m., RASHID arrived at JFK to depart for Pakistan on Etihad Airlines, and checked his luggage for the flight.

3. Following RASHID's check-in, the Transportation Safety Administration searched RASHID's luggage. Inside, officials discovered five sets of false identification documents for four different men (there were two sets for one of the men), for a total of 15 false identification documents.

4. Each document set consisted of a New York State driver's license, a U.S. Social Security card and a U.S. Permanent Resident card. I have examined the documents, and based on my training and experience in examining false government

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<sup>1/</sup> Because the purpose of this Complaint is to establish only probable cause to arrest, I have not set forth a description of all the facts and circumstances of which I am aware.

documents, including the types of documents RASHID possessed, all of the above documents are fraudulent.


5. After being read his Miranda rights, RASHID agreed to speak with investigators. In sum and substance, RASHID stated that he met a man in Pakistan who asked him to obtain documents for four men, whom RASHID did not know, so that the men could more easily travel in Europe and find employment.

6. RASHID agreed and, on his return to the United States, went to a business where he knew that false documents were sold. There, RASHID purchased the above documents for \$750. RASHID admitted that he intended to sell the documents in Pakistan for \$5,000.

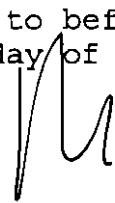
7. I have inquired with officials at the U.S. Department of Homeland Security, who informed me that none of the identification numbers on the false Permanent Resident cards RASHID possessed belong to the individuals on the cards. Furthermore, a search of the New York State Department of Motor Vehicles database showed that the driver's license numbers on the

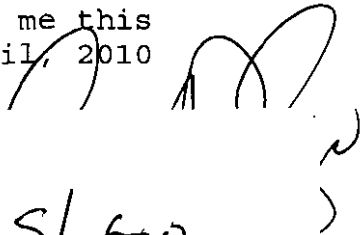
licenses RASHID possessed did not belong to the individuals on the cards.

WHEREFORE, your deponent respectfully requests that the defendant MOHAMMAD RASHID be dealt with according to law.

  
DET. SHAWN RUSSELL  
Port Authority of New York and New  
Jersey Police Department

Sworn to before me this  
13th day of April, 2010

  
UNITED STATE  
EASTERN DIST

  
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